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WALTER WILHELM LAW GROUP
A Professional Corporation
Riley C. Walter #91839
Matthew P. Bunting #306034
Danielle J. Bethel #315945
205 East River Park Circle, Ste. 410
Fresno, CA 93720
Telephone: (559) 435-9800
Facsimile: (559) 435-9868
E-mail: rileywalter@w2lg.com

Chapter 9 Counsel

MCCORMICK BARSTOW, LLP
Timothy L. Thompson #133537
Mandy L. Jeffcoach #232313
Niki E. Cunningham #277976
7647 N. Fresno Street
Fresno, CA 93720
Telephone: (559) 433-1300
Facsimile: (559) 433-2300
E-mail: mandy.jeffcoach@mccormickbarstow.com

District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-1

Chapter 9

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

**DECLARATION OF JEAN CHIANG IN SUPPORT OF APPLICATION FOR EX PARTE
ORDER IMPLEMENTING EFFECTIVE DATE ON ORDER GRANTING DEBTOR'S
MOTION FOR AUTHORIZATION TO REJECT EXECUTORY CONTRACT**

I, JEAN CHIANG, hereby declare and represent as follows:

1 1. I am the District Manager for the California Department of Public Health
2 ("CDPH") Bakersfield District Office. The Bakersfield District Office oversees the Tulare
3 Regional Medical Center. If called as a witness, I would and could competently testify to
4 all facts stated herein from my personal knowledge except where stated upon information
5 and belief and, as to these matters, I am informed and believe them to be true.
6

7 2. For approximately the past two months, I have been involved in CDPH's
8 evaluation and assessment of the Tulare Regional Medical Center. During that time, I
9 have been in regular contact with the Tulare Local Healthcare District ("the District")
10 through its legal counsel, members of the Board of Directors, and more recently through
11 the District's appointed crisis managers at Wipfl/HFS Consultants.
12

13 3. October 26, 2017, the Tulare Local Healthcare District provided notice to
14 CDPH of its intention to temporarily and voluntarily suspend its license. As a result, the
15 District informed CDPH that it would suspend all healthcare operations effective October
16 27, 2017 at midnight.

17 4. On October 28, 2017 at midnight, the District did in fact suspend all
18 healthcare operations. Presently, there are no patients being treated at any of the
19 District's healthcare facilities, including the Tulare Regional Medical Center and the
20 associated clinics. As a result, CDPH does not presently have any concerns for patient
21 safety within the District.
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1 5. In light of the foregoing, CDPH has approved the District's temporary
2 suspension of its license.

3 I am over the age of 18 and if I were called as a witness in connection with this
4 proceeding, I would and could testify as is set out in this declaration. I so declare under
5 penalty of perjury this day of November 08, 2017 at Bakersfield, California.
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9 JEAN CHIANG
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